

## **REMARKS**

Applicants respectfully traverse and request reconsideration.

Applicants wish to thank the Examiner for the notice that claims 98 and 99 would be allowable if the rejections under 35 U.S.C. § 112 were overcome. Applicants have amended the claims to overcome the § 112 rejections.

Also, there appears to be a typographical error since the allowable subject matter section also indicates that claims 11 and 66 would be allowable if written in independent form by stating that these claims contain subject matter “wherein said pointer comprises a bit encoding associated with each sample in said tile, wherein each bit represents an index to entries in said compressed format. Which is not found in the prior art of record...” (pages 14 and 15 of office action). However, this language is actually in claims 10 and 65 respectively. Accordingly, Applicants interpret that the allowable subject matter is claims 10 and 65. However, if this is not a proper assumption, Applicants respectfully request clarification of the allowable subject matter or claims.

Claims 1-6, 8-13, 34-35, 55-61, 63-68 and 89-99 stand rejected under 35 U.S.C. § 112, second paragraph as allegedly being indefinite. Applicants have amended the claims to address the rejection. Accordingly, Applicants respectfully request withdrawal of the rejection.

Claims 55-61, 63-65, 67-68, 90 and 92 stand rejected under 35 U.S.C. § 101 because these claims allegedly claim a computer program product comprising a computer readable medium. Applicants have amended the independent claims to indicate that the computer readable medium is non-transitory and Applicants respectfully request withdrawal of the rejection.

Claims 1-5, 8-10, 13, 34-35, 55, 89, 91 and 94 stand rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Jouppi et al. Applicants thank the Examiner for the comments in the “Response to Applicant’s Arguments/Amendments” section of the office action. Applicants have amended independent claims to further clarify that the claimed evaluation of the tiles for compression suitably is done prior to compression and the determination includes whether the partial compression will result in memory space savings compared to uncompressed pixel data. Support can be found at among other examples page 19 of Applicants’ Specification. It is alleged that Jouppi teaches this subject matter in col. 6, lns. 12-17 as well as col. 3, ln. 60 to col. 4, ln. 5 and cols. 30-35. However, there is no operation described that is done prior to compression to make any determination as to whether or not partial compression would actually result in a memory savings. In contrast, the cited portions of Jouppi merely appear to refer to the situation where compression is always accomplished or for argument sake, partial compression is always accomplished. No determination is done prior to compression to determine whether partial compression would result in a space savings compared to uncompressed pixel data. As stated in Applicants’ Specification, evaluation of tile compression suitably prior to compression can yield better compression results. Other advantages will be recognized by those of ordinary skill in the art. Applicants also respectfully reassert the relevant remarks made in the prior office action as well as again there is no pre-compression determination operation performed by the cited portions of Jouppi.

Claims 6, 12, 55-61, 63-65, 67-68, 90, 92 and 93 stand rejected under 35 U.S.C. §103(a) as allegedly being referenced obvious by Jouppi et al. in view of Molnar. Applicants respectfully reassert the relevant remarks made above. In addition, Applicants have amended

claim 90 to also include what is stated to be allowable subject matter by the Examiner. Accordingly, this claim is also believed to be in condition for allowance.

The dependent claims are also believed to add additional novel and non-obvious subject matter.

Accordingly, Applicants respectfully submit that the claims are now in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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